

# Walden Macht & Haran LLP



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September 13, 2018

**Via CM-ECF**

Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Alain Kaloyerros, et al.*, No. S2 16 Cr. 776 (VEC) (S.D.N.Y.)

Dear Judge Caproni:

We represent Joseph Gerardi in the above-referenced matter. We write to request that Mr. Gerardi's October 15, 2018 sentencing be adjourned in order to allow him additional time to compile and present information necessary for inclusion in the U.S. Probation Office's Presentence Investigation Report. We respectfully request that the Court adjourn sentencing to December, ideally December 4, 5, 6, 11, 12, or 13.

We have conferred with the Government and it does not object to this request.

Thank you for your attention to this matter.

Very truly yours,

WALDEN MACHT AND HARAN

By: /s/ *Milton L. Williams*

Milton L. Williams  
Avni P. Patel  
Jacob Gardener

cc: all parties, via ECF